1
2
3
4
5
6
7

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION	MDL No. 3047
	Case No. 4:22-md-03047-YGR
THIS FILING RELATES TO:	Honorable Yvonne Gonzalez Rogers
ALL ACTIONS	**DECLARATION OF PHILIP MORGAN BROWN IN SUPPORT OF OMNIBUS STIPULATION ON SEALING MATERIAL IN EXHIBIT TO PLAINTIFFS' SECOND AMENDED MASTER COMPLAINT (PERSONAL INJURY)**

I, Philip Morgan Brown, declare and state as follows:

1.   I am a Director of Product Management at Meta Platforms, Inc. ("Meta"). I joined Meta initially in July 2017 and departed in July 2020. I rejoined Meta in September 2022. Between August 2020 and August 2022, I was a Vice President of Growth at Shopify Inc. During my time at Meta, I have been a Product Manager on the Youth Team and for Messenger Kids, and Director of Product Management for Messenger Kids. Currently, I lead the Instagram Communities product group, which covers Growth, Well-being, Trust, and Product Foundation. I submit this Declaration in support of the Omnibus Stipulation on Sealing Material in Exhibit to Plaintiffs' Second Amended Master Complaint (Personal Injury) ("SAMC"). I make all statements in this Declaration based on my own personal knowledge.   If called upon to do so, I could and would competently testify as follows.

2.   The following portions of Exhibit B to the SAMC, a complaint filed by the Attorney General of New Mexico, include detailed user metrics that constitute confidential and proprietary information, and would cause competitive harm if disclosed publicly:
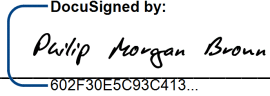
Paragraph	Portion To Be Sealed
38	Table after "January 2023:"
39	Table after "below:"
40	Table after "Instagram:" and table after "Facebook:"

3.   This information includes certain important user and performance metrics of "daily active user" and "monthly active user" data. Meta does not disclose this information publicly in the ordinary course of business. It is confidential, proprietary, and valuable. These figures are broken down to the geographical region of New Mexico and by certain age ranges and months.

4.   Disclosure of this information would provide Meta's competitors with insights about Meta's business that they would not otherwise have. Meta competes with many companies, including companies that facilitate the ability of users to share, communicate, and discover content and information online. Meta faces intense competition in every aspect of its business. As a result, Meta takes great care to protect information related to performance metrics and business strategy. Meta's competitors could use this information to, among other things, extrapolate trends about users by geographic region and age. They could exploit that information to test and assess their own user

1

1 numbers against Meta's information, assess Meta's position in the market, and undertake targeted

2 marketing.   This information would therefore give Meta's competitors an unfair advantage and

3 thereby cause Meta competitive harm.

4   I declare under penalty of perjury that the foregoing is true and correct. Executed on January

5 17, 2024, at Laguna Hills, California.

6

7   By: _____

8   Philip Morgan Brown

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DECLARATION OF PHILIP MORGAN BROWN IN SUPPORT OF OMNIBUS STIPULATION ON SEALING MATERIAL IN EXHIBIT TO
PLAINTIFFS' SECOND AMENDED MASTER COMPLAINT (PERSONAL INJURY)
4:22-md-03047-YGR